



Accident Records Air Wing Commercial Vehicle Enforcement
Motor Carrier Section Motor Vehicle Inspection

Traffic Division

State House Station 20

Augusta, Maine 043 33

QA 17550

February 10, 1993
FHWA-97-2176-2

FHWA Docket No. MC-92-10
Room 4232, HCC-10
Office of the Chief Counsel
Federal Highway Administration
400 Seventh Street, S.W.
Washington, D.C. 20590

The Maine State Police (MSP) would like to comment on FHWA Docket No. MC-92-10, Mandatory Minimum Training Requirements for Operators of Longer Combination Vehicles (LCV's).

Current entry-level truck driver training is directed towards single trailer combinations and does not, for the most part, address the operation of LCV's.

The Federal Highway Administration (FHWA) is responsible for the promulgation of regulations to establish minimum training standards for drivers of LCV's and certification of LCV instructors to assure a certain degree of quality control and uniformity.

FHWA is soliciting comments in several areas that directly concern the issue of LCV driver qualifications and training.

The MSP will address these issues in its comments to this docket.

The Intermodal Surface Transportation Efficiency Act of 1991 (ISTEA) defines LCV's and includes turnpike doubles, Rocky Mountain doubles, triple trailer combinations and unusually heavy western doubles. These types of vehicles are not permitted in the State of Maine and with the exception of turnpike doubles (they are restricted to certain highways in a very few states) are utilized little, if any, on the east coast of the United States. These vehicles are unique and easily recognizable however. If the term LCV is defined as only those vehicles listed above, enforcement of LCV training requirements should be straight forward. Any vehicle that is to be included in the definition of LCV should be identifiable by enforcement officers in the field.

DOCKET mc-92-10-1
PAGE 1 OF 3

If minimum training requirements for drivers are established, the MSP has a concern regarding enforcement of these standards. The MSP does not believe that FHWA has staff in place to enforce these standards or the expertise to determine adequacy of the training programs. This task could be best accomplished by the current licensing agencies of the states that administer the Commercial Drivers License (CDL) Program. Each current C.D.L. issuing agency could license LCV drivers and instructors through written exams and in-vehicle testing. LCV instructors should be held to a higher standard than drivers. Minimum requirements might be: a more in depth written exam, minimum five (5) years driving experience and a rigorous road test in the LCV.

Employment of drivers of LCV's should only be allowed when the applicant has a certificate of completion of LCV training and is licensed by the state for LCV operation. Accountability for training should be on the training facility and/or driver.

As stated previously, certification and evaluation of LCV training should be accomplished by the state. Certification of training programs by non-profit, private organization should be a selling point for the training facility and should be a goal of the facilities. Certification of training schools, however, should be done by the state.

Implementation of training requirements for LCV operators need to be phased in over a substantial time period. Currently, LCV training may be very limited in the United States.

Immediate compliance with this requirement could create difficulties within the industry. The MSP would suggest a three (3) year phase in period.

The MSP believes that LCV drivers should have at least one (1) year of experience with single trailer operations before a LCV license could be obtained.

The MSP does not feel that LCV training should be a requirement for a "double" endorsement on the CDL. While double may be unique in some instances, in many cases they are more manageable than single trailer combinations. The MSP does not believe that this is true of "triples". It also appears that triple-trailer combinations are defined as LCV's under the ISTEA.

Once training and certification is obtained for LCV's the MSP believes that operator is qualified. If that individual continues to operate LCV's there would appear to be little reason for repeat training. Currently, repeat training is not required for C.D.L. operators with the exception of the

vehicles should be treated in the same manner.

This concludes the MSP's comments on Docket No. MC-92-10.

Sincerely,

A handwritten signature in cursive script that reads "Harlan Pierson".

Lt. Harlan Pierson
Director
Commercial Vehicle Enforcement

HP:lc

DOCKET MC-92-10-1
PAGE 3 OF 3